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14 Toshiba America, Inc.,
15 Toshiba America Consumer Products, LLC,
16 Toshiba America Information Systems, Inc.,
17 and Toshiba America Electronic Components, Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

This Document Relates to:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
Case No. 3:11-cv-05513

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al.*, Case No. 13-cv-05264

*CompuCom Systems, Inc. v. Hitachi, Ltd., et
al.*, Case No. 3:11-cv-06396

*Costco Wholesale Corp. v. Hitachi, Ltd., et
al.*, Case No. 3:11-cv-06397

Dell Inc., et al. v. Hitachi, Ltd., et al., Case
No. 13-cv-02171

**DECLARATION OF LUCIUS B. LAU
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL
PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5(d)**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS' ADMINISTRATIVE MOTION
TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC
MDL No. 1917

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2 *Electrograph Systems, Inc., et al. v. Hitachi,*
3 *Ltd., et al., Case No. 3:11-cv-01656*
4 *Electrograph Systems, Inc., et al. v.*
5 *Technicolor SA, et al., Case No. 3:13-cv-*
6 *05724*
7 *Interbond Corp. of America v. Hitachi, Ltd., et*
8 *al., Case No. 3:11-cv-06275*
9 *Interbond Corp. of America v. Technicolor*
10 *SA, et al., Case No. 3:13-cv-05727*
11 *Office Depot, Inc. v. Hitachi, Ltd., et al., Case*
12 *No. 3:11-cv-06276*
13 *Office Depot, Inc. v. Technicolor SA, et al.,*
14 *Case No. 3:13-cv-05726*
15 *P.C. Richard & Son Long Island Corp., et al.*
16 *v. Hitachi, Ltd., et al., Case No. 3:12-cv-*
17 *02648*
18 *P.C. Richard & Son Long Island Corp., et al.*
19 *v. Technicolor SA, et al., Case No. 3:13-cv-*
20 *05725*
21 *Sears, Roebuck & Co. and Kmart Corp. v.*
22 *Chunghwa Picture Tubes, Ltd., et al., Case*
23 *No. 3:11-cv-05514*
24 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
25 *al., Case No. 3:13-cv-00157*
26 *Viewsonic Corporation v. Chunghwa*
27 *Picture Tubes, Ltd., et al., Case No. 3:14-*
28 *cv-002510*

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Case No. 07-5944 SC
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, attorneys for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information
4 Systems, Inc., Toshiba America Consumer Products, LLC, and Toshiba America Electronic
5 Components, Inc. (collectively, the “Toshiba Defendants”). I make this declaration in
6 support of Defendants’ Administrative Motion to File Documents Under Seal Pursuant to
7 Civil Local Rules 7-11 and 79-5(d) (the “Motion to Seal”).

8 2. Except for those matters stated on information and belief, which I believe to be
9 true, I have personal knowledge of the facts set forth herein and, if called upon, could and
10 would competently testify thereto under oath.

11 3. On June 18, 2008, the Court approved a Stipulated Protective Order (Dkt. No.
12 306) (“Protective Order”) in this matter.

13 4. The Toshiba Defendants and other parties to this litigation have produced in
14 this action certain documents and information designated as either “Confidential” or “Highly
15 Confidential” pursuant to the Stipulated Protective Order.

16 5. On February 9, 2015, Defendants filed an administrative motion to seal the
17 following document, pursuant to Civil Local Rules 7-11 and 79-5(d): Designated portions of
18 the Reply Memorandum in Support of Motion to Exclude Certain Expert Testimony of
19 Professor Kenneth Elzinga.

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TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

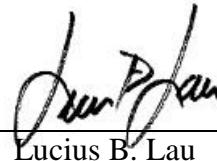
Case No. 07-5944 SC
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1 6. Pursuant to Civil Local Rules 7-11 and 79-5(d), this Court's General Order
2 No. 62, Electronic Filing of Documents Under Seal, effective May 10, 2010, and the
3 Protective Order, the designated portions of the Reply Memorandum in Support of Motion to
4 Exclude Certain Expert Testimony of Professor Kenneth Elzinga and Exhibit A to the
5 Declaration of Lucius B. Lau, dated February 9, 2015 attached thereto should be maintained
6 under seal.

7 I declare under penalty of perjury that the foregoing is true and correct.
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9 Executed this 9th day of February, 2015, in Washington, D.C.

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Lucius B. Lau

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CERTIFICATE OF SERVICE

On February 9, 2015, I caused a copy of “DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS’ ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)” to be electronically filed via the Court’s Electronic Case Filing System, which constitutes service in this action pursuant to the Court’s order of September 29, 2008.

/s/ *Lucius B. Lau*

Lucius B. Lau

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